

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TILLIE SALTZMAN, Individually And On Behalf
Of All Others Similarly Situated,

Plaintiff,

V.

CITIGROUP INC., CHARLES O. PRINCE,
ROBERT E. RUBIN, STEPHEN R. VOLK,
SALLIE L. KRAWCHECK, GARY L.
CRITTENDEN and ROBERT DRUSKIN,

Defendants.

07 CV 09901 (SHS) (FM)

CLASS ACTION

ECF CASE

LENNARD HAMMERSCHLAG, Individually
And on Behalf of All Others Similarly Situated,

Plaintiff,

V.

CITIGROUP INC., CHARLES PRINCE, SALLIE
KRAWCHECK and GARY CRITTENDEN,

Defendants.

07 CV 10258 (SHS)

CLASS ACTION

**NOTICE OF MOTION OF DAVID GARDEN FOR
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF PURSUANT TO
§21D(a)(3)(B) OF THE SECURITIES EXCHANGE ACT OF 1934
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that Movant David Garden, upon the Declaration of Joseph H. Weiss dated January 7, 2008, and the exhibits annexed thereto, the accompanying Memorandum of Law, all of the prior pleadings and proceedings had herein, and such other evidence as the Court may consider at the hearing on this motion, hereby respectfully moves this Court for an order in the form filed herewith: (i) consolidating the related actions captioned above; (ii) appointing David Garden as Lead Plaintiff in the action pursuant to the Private Securities Litigation Reform Act of 1995; and (iii) approving Movant's selection of Lead Counsel.

Dated: January 7, 2008

Respectfully submitted,

WEISS & LURIE

By: /s/ Joseph H. Weiss
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**Counsel for Movant David Garden and
Proposed Lead Counsel For Plaintiff and
The Class**